

Exhibit 57

SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION,**

Case No. 4:22-MD-03047-YGR

THIS DOCUMENT RELATES TO:

MDL No. 3047

Charleston County School District v. Meta
 Platforms Inc., et al.

AFFIDAVIT OF ANITA HUGGINS

Member Case No.: 4:23-cv-4659

My name is Anita Huggins, and I make this declaration based on my personal knowledge.

1. I received a Bachelor of Arts in English and Secondary Education from Coastal Carolina University in 1998. I received a Master of Education in Educational Leadership and Administration from The Citadel College of Graduate & Professional Studies in 2002.

2. I have 27 years of experience working in PreK-12 education.

3. I have been the Superintendent of Schools for Charleston County School District (“CCSD”) since 2023.

4. In my position as Superintendent, I serve as an instructional leader, knowledgeable regarding best practices for maximizing student achievement. I also work collaboratively with the Board of Trustee to improve student outcomes and ensure operational efficiency. In furtherance of these objectives, I have forged strong partnerships with stakeholders, including teachers, school-based and District leaders, parents, community members, businesses, and political leaders. These partnerships are critical in keeping abreast of the day-to-day struggles and successes of CCSD’s students and staff.

1 5. Prior to serving as Superintendent, I worked in CCSD as an English Teacher at Fort Johnson
2 Middle School from 1998 to 2002.

3 6. From 2002 to 2003, I worked as a Master Teacher in CCSD's Office of Teacher Evaluation.
4 In that position, one of my objectives for mentoring and coaching educators across CCSD was in
5 instructional and behavioral management best practices.

6 7. Since 2003, I have held various other administrative and strategic roles within CCSD,
7 including serving as the Executive Director of Educator Effectiveness for over a decade where I
8 trained hundreds of teachers and administrators.

9 8. From 2019 to 2020, I was the Principal at Moultrie Middle School. In this position, I
10 observed the pervasiveness of social media and the negative effects of social media.

11 9. The negative impacts I personally witnessed included, but were not limited to, excessive
12 and compulsive use of social media platforms, poor sleep hygiene, and increased levels of anxiety
13 and depression in the student body which often affected students' ability to interact in healthy ways
14 face-to-face. I witnessed students suffering from anxiety and depression that resulted from bullying
15 and harassment that took place on social media.

16 10. I was so concerned about what I observed that I instituted a cell phone ban at Moultrie
17 Middle School; however, banning phones did not solve the problem because the problem was not
18 the phone itself but the obsessive use of social media platforms by students. These problems
19 continued to arise following the phone ban.

20 11. Based on my experience in the district, and upon information received from CCSD
21 principals on the amount of time being spent by middle school principals, assistant principals, and
22 other school administrators, a conservative estimate of their time spent dealing with social media
23 issues is 10%. They have also reported an average increase of 70% more time spent on these issues
24 now than in 2017.

25 12. At the high school level, CCSD's principals have reported that the average amount of time
26 they, as well as their assistant principals and other school administrators, spend dealing with social
27
28

1 media issues is 15%. This represents, on average, an increase of more than 150% of time spent on
2 these issues since 2017.

3 13. Principals at both middle and high schools have also reported to me that 80 to 90% of
4 student fights and altercations have a social media nexus.

5 14. I regularly interact with CCSD principals serving grades 6-12. Based on these interactions,
6 it is my understanding and observation that my experience as principal of Moultrie Middle and the
7 reports of similar issues throughout the district are indicative of district-wide patterns. Staff
8 throughout the district now dedicate significant time to addressing social media-related concerns
9 and issues, with this time commitment increasing substantially over the past several years.

10 Pursuant to 28 U.S.C. § 1746, I hereby declare and certify, under penalty of perjury, that the
11 foregoing is true and correct.

12 Executed on 5/12/2025.

13 Signed by:

14 *Anita Huggins*

15 Anita Huggins

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